

# Exhibit A – Declaration of Scott Carney

1 DANIEL R. MCNUTT (SBN 7815)  
2 MATTHEW C. WOLF (SBN 10801)  
3 MCNUTT LAW FIRM, P.C.  
4 625 South Eighth Street  
5 Las Vegas, Nevada 89101  
6 Tel.: (702) 384-1170 / Fax.: (702) 384-5529  
7 [drm@mcnuttlawfirm.com](mailto:drm@mcnuttlawfirm.com)  
[mew@mcnuttlawfirm.com](mailto:mew@mcnuttlawfirm.com)  
8 *Attorneys for Defendant Scott Carney*

9  
10 UNITED STATES DISTRICT COURT  
11  
12 DISTRICT OF NEVADA

13 INTERNATIONAL MARKETS LIVE, INC., a  
14 New York corporation; CHRISTOPHER  
15 TERRY, an individual;

16 Plaintiffs

17 vs.

18 ROBERT HALTERMAN, an individual;  
19 SCOTT CARNEY, an individual; ETHAN  
20 VANDERBUILT, an individual;

21 Defendants.

22 Case No.: 2:18-cv-00187-JAD-GWF

23  
24 DECLARATION BY DEFENDANT SCOTT  
25 CARNEY IN SUPPORT OF  
MEMORANDUM OF LAW IN SUPPORT  
OF  
MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT

26 I, Scott Carney, declare as follows:

- 27 1. I live in Miami, Florida, and that is my sole residence.  
28 2. I do not have any businesses in Nevada.  
29 3. I have no offices in Nevada.  
30 4. I own no property in Nevada.  
31 5. I have no employees in Nevada.  
32 6. I have no bank accounts in Nevada.  
33 7. I do not direct or target any activities to Nevada.  
34 8. I do not have any connections to Nevada outside of my legal counsel.

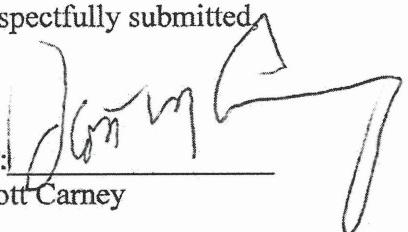
1       9. I am disabled and wheelchair bound, and commuting to court in Las Vegas,  
2 Nevada, would be inconvenient for me to attend any hearings or trial.

3       10. No Nevada court has ever found to have personal jurisdiction over me, and I  
4 have never been served in Nevada.

5           Pursuant to 28 USC § 1746, I hereby declare under penalty of perjury under the laws  
6 of the United States of America that the foregoing is true and correct and is based upon my  
7 personal knowledge.

8  
9  
10      Dated: May 1, 2018

11           Respectfully submitted,

12           By:   
13           Scott Carney